

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Docket No.:

-----X 15-4244(JGK)(OTW)

GYM DOOR REPAIRS, INC. and SAFEPATH SYSTEMS,
LLC,

Plaintiffs,
-against-

**NOTICE OF
APPLICATION FOR
COSTS SOUGHT
AGAINST PLAINTIFFS**

YOUNG EQUIPMENT SALES, INC., YES SERVICE AND
REPAIRS CORPORATION, RICHARD YOUNG, BRIAN
BURKE, DENNIS SCHWANDTNER, GUARDIAN GYM
EQUIPMENT, QAPALA ENTERPRISES, INC., JAMES
PETRIELLO, TRI-STATE FOLDING PARTITIONS, INC.,
PETER MUCCIOLO, EDUCATIONAL DATA SERVICES,
INC. TOTAL GYM REPAIRS, INC., NEW YORK STATE
DEPARTMENT OF EDUCATION OFFICE OF FACILITIES
PLANNING, NEW YORK STATE SCHOOL FACILITIES
ASSOCIATION, SCHOOL FACILITIES MANAGEMENT
INSTITUTE, EASTERN SUFFOLK BOCES, NASSAU
COUNTY BOCES, BELLMORE PUBLIC SCHOOLS, NEW
YORK CITY DEPARTMENT OF EDUCATION,

Defendants.

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PLEASE TAKE NOTICE that upon Defendant Total Gym Repairs, Inc.'s Bill of Costs,
the accompanying Declaration of Effimia Soter, and upon all the exhibits annexed thereto,
Defendant Total Gym Repairs, Inc. by its attorneys, the Law Offices of Effie Soter, P.C., will
move this Court before the Orders and Judgment Clerk, at the United States District Court for the
Southern District of New York, located at 500 Pearl Street, Room 250, New York, New York
10007 on Friday, July 31, 2020 at 11:30 A.M., for an Order: (1) pursuant to Fed. R. Civ. P. Rule
54, Local Rule 54.1, 28 U.S.C. §§ 1920 and 1923 granting fees and costs sought by Defendant

Total Gym Repairs, Inc.; and (2) granting Defendant Total Gym Repairs, Inc. such other and further relief that this Court may deem just, equitable, and proper.

Dated: New York, New York
July 13, 2020

Yours, etc.

LAW OFFICES OF EFFIE SOTER, P.C.

By: /s/ *Effimia Soter*
Dimitrios Kourouklis (DK 0073)
Effimia Soter (ES 0486)
Attorneys for Defendant
TOTAL GYM REPAIRS, INC.
20 West 20th Street, 2nd Floor
New York, New York 10011
(646) 504-7384

To: All counsel of record via ECF filing